

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Unlicensed Operation in the TV	)	ET Docket No. 04-186
Broadcast Bands	)	

To: Secretary, Federal Communications Commission

**REPLY COMMENTS OF SPECTRUM BRIDGE INC.**

Spectrum Bridge Inc. (“SBI”) hereby responds to the Comments filed in this proceeding<sup>1</sup> concerning our TV bands database trial. After careful consideration of the Comments, we do not believe that there is sufficient basis to either extend the trial or to delay in certifying SBI as the first TV bands database administrator. Any remaining concerns can be resolved when the database is “live.”

There is pent up customer demand for rural broadband applications today using TV white space. We have the ability to manage the roll out in the early stages following database and equipment certification. This will allow everyone to use the database and for industry to make any appropriate updates as a result of this experience. We suggest that all interested parties take advantage of this opportunity to prepare for a future when there will be mass adoption. This action would serve the public interest better than a new trial period that would impose delay in unlicensed use of the TV white space.

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<sup>1</sup> *Public Notice*, “Office of Engineering and Technology Requests Comment on the Public Testing of Spectrum Bridge Inc.’s TV Bands Database System,” DA 11-1872, rel. Nov. 10, 2011 (“*Public Notice*”). Comments were filed by the Wireless Internet Service Providers Association (“WISPA”), the National Association of Broadcasters (“NAB”), Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (“EIBASS”), Key Bridge Global LLC (“Key Bridge”) and the Land Mobile Communications Council.

SBI reaffirms its commitment to ensure that incumbents are adequately protected in accordance with FCC rules<sup>2</sup> and to support any and all efforts to resolve questions and concerns, and we will continue to assist in demonstrating that the correct protections are being afforded. Our production solution incorporates all the reporting systems deployed in the trial to facilitate resolution to comments, questions and issues. SBI further commits to follow up diligently and expeditiously on any issues that may arise and, to accommodate NAB's concerns,<sup>3</sup> to incorporate any rule changes and new protected facilities into the database on a going-forward basis.

Respectfully submitted,

December 2, 2011

**SPECTRUM BRIDGE INC.**

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<sup>2</sup> EIBASS asks the Commission to expand its protection standards beyond those contained in the rules, e.g., to the contours of Canadian and Mexican stations within the U.S. border. *See* EIBASS Comments at 1-3. FCC rules do not require such protection. SBI's database accurately protects foreign TV stations at the border, consistent with FCC rules.

<sup>3</sup> *See* NAB Comments at 4-5.